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*and TRD, U.S.A., Inc.*

**UNITED STATES BANKRUPTCY COURT**  
**FOR THE SOUTHERN DISTRICT OF NEW YORK**

<b>In re:</b>	) <b>Chapter 11</b>
	)
<b>GENERAL MOTORS CORP., et al</b>	) <b>Case No. 09-50026 (REG)</b>
	)
<b>Debtors.</b>	) <b>Jointly Administered</b>

**SUPPLEMENTAL OBJECTION AND RESERVATION OF RIGHTS**  
**OF TOYOTA MOTOR SALES, U.S.A., INC. AND TRD, U.S.A., INC.**  
**TO DEBTORS' MOTION, *INTER ALIA*, TO ASSUME AND ASSIGN CERTAIN**  
**EXECUTORY CONTRACTS AND TO CURE AMOUNTS**

Toyota Motor Sales USA ("TMS/USA") and TRD, U.S.A., Inc. ("TRD"), by and through their undersigned counsel, hereby object to the motion (the "Motion") of the above-captioned debtors and debtors in possession (collectively, the "Debtors") for an order authorizing the Debtors to, *inter alia*, assume and assign certain executory contracts to Vehicle Acquisition Holdings, LLC based on its disagreement with the Debtors' cure amounts, and respectfully state as follows:

**BACKGROUND**

1. Pursuant to a series of contracts, TMS/USA, among other things, supplies parts to the Debtors. TMS/USA's parent, Toyota Motor Corporation ("TMC") and other TMS/USA subsidiaries and affiliates, including TRD, also have a variety of contracts and ongoing arrangements with the Debtors.

2. On or about June 5, 2009, the Debtors served certain parties to executory contracts with *Notice of (I) Debtors' Intent to Assume and Assign Certain Executory Contracts, Unexpired Leases of Nonresidential Real Property and (II) Cure Amounts Related Thereto* (the "Assumption Notices"), pursuant to which executory contract parties whose contracts may be assumed were directed to a website listing cure amounts. Such parties were given ten days from the date of the notice within which to assert objections to the potential assumption and assignment and/or to the cure amounts.

3. TMS/USA and its affiliates are large international companies with worldwide operations. As such, it is possible that TMS/USA or one or more of its affiliates was served with an Assumption Notice, but that such notice has not yet reached the individuals at TMS/USA responsible for this matter.

4. Accordingly, out of an abundance of caution, on June 12, 2009, Toyota USA filed and served its *Objection of Toyota Motor Sales USA to Debtors' Motion, Inter Alia, to Assume and Assign Certain Executory Contracts*, pursuant to which it sought to condition any order authorizing the assumption and assignment of Toyota/GM contracts upon the resolution by the parties of the appropriate cure amounts and reserved all of its rights with respect to any such notices and cure amounts identified by the Debtors.

5. Since filing its objection, TMS/USA has received a second Assumption Notice, dated June 15, 2009 (the "Second Assumption Notice"), addressed to TMC but delivered to TMS/USA relating to additional Toyota/GM contracts identified on Exhibit A hereto. TMS/USA followed the instructions provided in the Second Assumption Notice, including accessing the Debtors' website and reviewing the list of contracts which may be assumed and assigned and related cure amounts listed with respect to such contracts. Given the cursory

information contained on the website, it is not possible for TMS/USA to identify which contracts are subject to assumption or the related cure amounts. Indeed, none of the contracts are identified by name or date on the website.

6. However, TMS/USA has compared the cure amounts listed by Bill of Lading number to its books and records for one of the contracts between TMS/USA and GM for certain service parts. Listed on Exhibit A hereto are the cure amounts which TMS/USA believes are accurate based on its books and records with respect to that contract. Accordingly, TMS/USA objects to the Debtors' cure amounts with respect to such contract to the extent they differ from those of TMS/USA.

7. TMS/USA also objects to the assumption of and proposed cure amount listed on Exhibit B hereto<sup>1</sup> (GM Contract ID No. GM59207) pending the receipt from the Debtors of information sufficient to permit TMS/USA to identify such contract and verify such cure amount.

8. In addition, TRD objects to the assumption of and proposed cure amount listed on Exhibit B hereto (GM Contract ID No. GM44201) pending the receipt from the Debtors of information sufficient to permit TRD to identify such contract and verify such cure amount.

9. TMS/USA, TRD and their respective affiliates also hereby reserve their respective rights with respect to any additional assumption notices received.

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<sup>1</sup> Exhibit B hereto is an excerpt from the Debtors' website.

**CONCLUSION**

WHEREFORE, TMS/USA, TRD and their respective affiliates, respectfully request that the Motion be conditioned on the resolution of appropriate cure amounts and the identification of the contracts to be assumed, together with such other and further relief as this Court deems just and proper.

Dated: New York, New York  
June 25, 2009

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## **EXHIBIT A**

## TMS A/R Listing

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Total Balance \$ 296,495.23

as of June 22, 2009

Bill of Lading	Status	Entry Type	Outstanding Balance	Invoice Date	Due Date	Orig Invoice Amt
O610083	O	IN	123.02	2008-10-01	2008-11-25	959.63
O616233	O	IN	0.12	2008-10-08	2008-11-25	9,562.16
O616226	O	IN	1.30	2008-10-08	2008-11-25	22.55
O616237	O	IN	6,991.24	2008-10-08	2008-11-25	6,991.24
O622664	O	IN	-23.03	2008-10-15	2008-11-25	5,841.85
O622671	O	IN	0.60	2008-10-15	2008-11-14	112.63
O627759	O	IN	-626.53	2008-10-21	2008-11-20	137.61
O627575	O	IN	-17.95	2008-10-21	2008-11-20	4.20
H045740	O	IN	2.60	2008-10-21	2008-11-20	13,115.70
O628544	O	IN	-3,030.08	2008-10-22	2008-11-21	1.86
O628615	O	IN	-239.22	2008-10-22	2008-11-21	0.27
O628538	O	IN	-80.65	2008-10-22	2008-11-21	0.27
O628164	O	IN	-71.65	2008-10-22	2008-11-21	9.27
O628485	O	IN	-26.17	2008-10-22	2008-11-21	0.85
O628225	O	IN	-10.14	2008-10-22	2008-11-21	0.54
O628589	O	IN	-2.86	2008-10-22	2008-11-21	0.54
O628585	O	IN	-1.91	2008-10-22	2008-11-21	0.49
O628610	O	IN	-0.05	2008-10-22	2008-11-21	0.49
O628373	O	IN	0.19	2008-10-22	2008-11-21	0.19
O628601	O	IN	0.22	2008-10-22	2008-11-21	0.49
O628229	O	IN	0.53	2008-10-22	2008-11-21	0.80
O628366	O	IN	0.57	2008-10-22	2008-11-21	0.57
O628532	O	IN	1.16	2008-10-22	2008-11-21	1.70
O628178	O	IN	1.37	2008-10-22	2008-11-21	1.86
O628220	O	IN	2.20	2008-10-22	2008-11-21	3.40
O628388	O	IN	2.27	2008-10-22	2008-11-21	2.27
O628521	O	IN	3.39	2008-10-22	2008-11-21	9.32
O628401	O	IN	7.47	2008-10-22	2008-11-21	8.07
O628382	O	IN	10.68	2008-10-22	2008-11-21	10.68
O628188	O	IN	11.04	2008-10-22	2008-11-21	11.04
O628156	O	IN	11.26	2008-10-22	2008-11-21	27.02
O628509	O	IN	14.83	2008-10-22	2008-11-21	15.76
O628379	O	IN	15.22	2008-10-22	2008-11-21	15.76
O628140	O	IN	15.57	2008-10-22	2008-11-21	15.76
O628597	O	IN	26.48	2008-10-22	2008-11-21	27.02
O628297	O	IN	32.01	2008-10-22	2008-11-21	34.48
O628204	O	IN	63.32	2008-10-22	2008-11-21	73.79
O628193	O	IN	166.76	2008-10-22	2008-11-21	169.76
O630282	O	IN	-79.99	2008-10-23	2008-11-22	0.93
H676663	O	IN	-24.18	2008-10-23	2008-11-22	1,325.11
O630276	O	IN	-1.31	2008-10-23	2008-11-22	0.93
O630280	O	IN	0.55	2008-10-23	2008-11-22	0.93
O630265	O	IN	5.93	2008-10-23	2008-11-22	5.93
O630283	O	IN	201.42	2008-10-23	2008-11-22	201.42
O631411	O	IN	-42.66	2008-10-24	2008-11-23	4.11
H676790	O	IN	-24.18	2008-10-24	2008-11-23	1,325.11
O630612	O	IN	-19.75	2008-10-24	2008-11-23	2.40
O631429	O	IN	-8.96	2008-10-24	2008-11-23	6.80
O631425	O	IN	-1.56	2008-10-24	2008-11-23	0.91
O631410	O	IN	0.38	2008-10-24	2008-11-23	0.92
O631424	O	IN	0.78	2008-10-24	2008-11-23	1.08
O630595	O	IN	2.79	2008-10-24	2008-11-23	2.79
O631412	O	IN	7.36	2008-10-24	2008-11-23	8.22
O631403	O	IN	35.87	2008-10-24	2008-11-23	36.80
H045858	O	IN	144.82	2008-10-24	2008-11-23	1,224.75
O631433	O	IN	151.99	2008-10-24	2008-11-23	152.57
T300638	O	IN	239.05	2008-10-24	2008-11-23	239.32
O632869	O	IN	-45.11	2008-10-27	2008-11-26	1.66
O632873	O	IN	0.90	2008-10-27	2008-11-26	1.66
H046016	O	IN	-29.04	2008-10-29	2008-11-25	195.93
O635229	O	IN	0.10	2008-10-29	2008-11-28	14,585.72
O635235	O	IN	0.20	2008-10-29	2008-11-28	101.71
O636920	O	IN	-18.47	2008-10-30	2008-11-29	8.55
O636918	O	IN	-8.07	2008-10-30	2008-11-29	1.20
O636924	O	IN	0.38	2008-10-30	2008-11-29	0.38
O636921	O	IN	2.28	2008-10-30	2008-11-29	2.28
O636915	O	IN	5.33	2008-10-30	2008-11-29	5.93
O637846	O	IN	-75.89	2008-10-31	2008-11-30	5.03
O637283	O	IN	-64.20	2008-10-31	2008-11-30	0.27
O637291	O	IN	-26.79	2008-10-31	2008-11-30	0.27
O637284	O	IN	-26.52	2008-10-31	2008-11-30	0.54
O637286	O	IN	-26.52	2008-10-31	2008-11-30	0.54
O637848	O	IN	-10.52	2008-10-31	2008-11-30	2.22
O637285	O	IN	-1.43	2008-10-31	2008-11-30	0.27
O637849	O	IN	-1.14	2008-10-31	2008-11-30	17.85
O637290	O	IN	-0.58	2008-10-31	2008-11-30	0.27
O637287	O	IN	-0.26	2008-10-31	2008-11-30	0.54
O637293	O	IN	0.27	2008-10-31	2008-11-30	0.54
T303444	O	IN	0.60	2008-10-31	2008-11-30	0.60
T303445	O	IN	0.60	2008-10-31	2008-11-30	0.60
T303446	O	IN	0.60	2008-10-31	2008-11-30	0.60
T303447	O	IN	0.60	2008-10-31	2008-11-30	0.60
O637855	O	IN	2.46	2008-10-31	2008-11-30	4.74
O637859	O	IN	78.45	2008-10-31	2008-11-30	80.92
H046100	O	IN	1,098.14	2008-10-31	2008-11-30	8,930.85
O639372	O	IN	-3.42	2008-11-03	2008-12-03	24.37
O639378	O	IN	136.37	2008-11-03	2008-12-03	137.61

TMS A/R Listing

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Total Balance \$ 296,495.23

as of June 22, 2009

Bill of Lading	Status	Entry Type	Outstanding Balance	Invoice Date	Due Date	Orig Invoice Amt
O640013	O	IN	-392.88	2008-11-04	2008-12-04	41.08
H677723	O	IN	-17.24	2008-11-04	2008-12-04	392.88
O640898	O	IN	-36.80	2008-11-05	2008-12-05	232.12
H677874	O	IN	-2.24	2008-11-05	2008-12-05	2.75
O640907	O	IN	-0.31	2008-11-05	2008-12-05	0.62
O641461	O	IN	66.03	2008-11-05	2008-12-05	9,637.69
O641462	O	IN	15,793.76	2008-11-05	2008-12-25	21,857.64
O643443	O	IN	-2.79	2008-11-07	2008-12-07	7.52
H046326	O	IN	56.40	2008-11-07	2008-12-07	12,386.40
O644963	O	IN	-15.27	2008-11-10	2008-12-10	34.91
H678461	O	IN	142.99	2008-11-11	2008-12-11	201.42
H678610	O	IN	-138.51	2008-11-12	2008-12-12	201.42
O647755	O	IN	97.62	2008-11-12	2008-12-12	12,054.88
O647107	O	IN	1,321.00	2008-11-12	2008-12-12	1,325.11
O649191	O	IN	165.22	2008-11-13	2008-12-13	165.22
H046567	O	IN	330.45	2008-11-14	2008-12-14	330.45
O653257	O	IN	3.20	2008-11-18	2008-12-18	3.20
O653253	O	IN	9.60	2008-11-18	2008-12-18	9.60
O653563	O	IN	-418.98	2008-11-19	2008-12-25	3,749.69
O653559	O	IN	0.76	2008-11-19	2008-12-25	2,435.99
O654472	O	IN	3.20	2008-11-19	2008-12-19	3.20
O653561	O	IN	18.15	2008-11-19	2008-12-19	785.69
O653556	O	IN	70.35	2008-11-19	2008-12-19	18,318.51
O653918	O	IN	391.97	2008-11-19	2008-12-19	392.88
H679343	O	IN	2,650.22	2008-11-19	2008-12-19	2,650.22
O657443	O	IN	2,344.28	2008-11-24	2008-12-25	2,344.28
H046971	O	IN	2,286.50	2008-11-26	2008-12-26	8,062.35
H046977	O	IN	8,230.60	2008-11-26	2008-12-26	8,230.60
O663778	O	IN	-63.38	2008-12-02	2009-01-01	165.38
O664435	O	IN	-64.40	2008-12-03	2009-01-02	3.27
O665037	O	IN	-11.25	2008-12-03	2009-01-02	1,757.96
O664687	O	IN	-3.35	2008-12-03	2009-01-02	3.27
O664688	O	IN	-2.47	2008-12-03	2009-01-02	26.08
O664436	O	IN	0.14	2008-12-03	2009-01-02	6.54
O664434	O	IN	0.30	2008-12-03	2009-01-02	0.30
O664431	O	IN	1.27	2008-12-03	2009-01-02	65.74
O664686	O	IN	62.63	2008-12-03	2009-01-02	62.63
O665038	O	IN	803.73	2008-12-03	2009-01-25	6,414.24
O664864	O	IN	1,233.22	2008-12-03	2009-01-02	1,233.22
O666960	O	IN	-1.38	2008-12-04	2009-01-03	47.67
O667129	O	IN	0.90	2008-12-04	2009-01-03	47.67
O667176	O	IN	0.90	2008-12-04	2009-01-03	47.67
O667211	O	IN	0.90	2008-12-04	2009-01-03	47.67
O666970	O	IN	47.67	2008-12-04	2009-01-03	47.67
O668117	O	IN	-439.68	2008-12-05	2009-01-04	62.63
O667535	O	IN	-137.25	2008-12-05	2009-01-04	14.16
O668319	O	IN	-129.59	2008-12-05	2009-01-04	1,233.22
O668114	O	IN	-80.92	2008-12-05	2009-01-04	11.04
O668645	O	IN	-74.05	2008-12-05	2009-01-04	0.30
O668115	O	IN	-15.76	2008-12-05	2009-01-04	205.41
O668112	O	IN	-6.65	2008-12-05	2009-01-04	7.67
T319692	O	IN	-1.62	2008-12-05	2009-01-04	0.72
O667537	O	IN	-1.23	2008-12-05	2009-01-04	0.32
O667534	O	IN	-0.39	2008-12-05	2009-01-04	0.80
O667533	O	IN	0.07	2008-12-05	2009-01-04	3.27
T319842	O	IN	0.85	2008-12-05	2009-01-25	196.55
O667538	O	IN	15.00	2008-12-05	2009-01-04	16.20
T319834	O	IN	149.34	2008-12-05	2009-01-04	209.74
H047248	O	IN	1,165.08	2008-12-05	2009-01-04	1,165.08
H681329	O	IN	-1.04	2008-12-09	2009-01-08	71.20
O671353	O	IN	-0.19	2008-12-09	2009-01-08	7.67
H681503	O	IN	-9.54	2008-12-10	2009-01-09	2.99
O673012	O	IN	-1.68	2008-12-10	2009-01-09	1.24
O673121	O	IN	-3,329.27	2008-12-11	2009-01-10	231.91
O673013	O	IN	-3,046.37	2008-12-11	2009-01-10	0.41
O673018	O	IN	-400.69	2008-12-11	2009-01-10	41.84
O673015	O	IN	-106.19	2008-12-11	2009-01-10	0.62
O673017	O	IN	-19.08	2008-12-11	2009-01-10	39.28
O673964	O	IN	-8.64	2008-12-11	2009-01-10	1,349.29
O673019	O	IN	-6.26	2008-12-11	2009-01-10	6.54
O673014	O	IN	-1.05	2008-12-11	2009-01-10	16.06
O673129	O	IN	0.16	2008-12-11	2009-01-10	41.84
O673212	O	IN	2.23	2008-12-11	2009-01-25	1,303.08
O673016	O	IN	6.54	2008-12-11	2009-01-10	6.54
O673963	O	IN	21.10	2008-12-11	2009-01-10	1,349.29
O673232	O	IN	5,369.07	2008-12-11	2009-01-25	5,369.07
O675768	O	IN	-61.76	2008-12-12	2009-01-11	4.64
O675769	O	IN	-2.01	2008-12-12	2009-01-11	76.88
T322939	O	IN	1.40	2008-12-12	2009-01-11	127.16
T322972	O	IN	19.71	2008-12-12	2009-01-25	1,679.38
T323482	O	IN	24.36	2008-12-12	2009-01-11	1,283.94
O678556	O	IN	-64.47	2008-12-16	2009-01-15	205.41
O678433	O	IN	-6.64	2008-12-16	2009-01-15	155.56
T324842	O	IN	0.58	2008-12-16	2009-01-15	30.57
T324586	O	IN	39.10	2008-12-16	2009-01-25	1,132.67
H047546	O	IN	83.40	2008-12-16	2009-01-15	12,963.80
T325197	O	IN	-0.33	2008-12-17	2009-01-25	3,831.35

TMS A/R Listing

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Total Balance \$ 296,495.23

as of June 22, 2009

Bill of Lading	Status	Entry Type	Outstanding Balance	Invoice Date	Due Date	Orig Invoice Amt
O679642	O	IN	1.80	2008-12-17	2009-01-16	55.04
O679637	O	IN	48.25	2008-12-17	2009-01-16	2,992.04
O679641	O	IN	278.48	2008-12-17	2009-01-16	16,841.60
O679640	O	IN	372.37	2008-12-17	2009-01-25	33,666.13
O679638	O	IN	590.05	2008-12-17	2009-01-25	68,500.23
H047632	O	IN	39.80	2008-12-18	2009-01-17	22,235.80
T327968	O	IN	0.80	2008-12-22	2009-01-25	24.80
T327975	O	IN	786.73	2008-12-22	2009-01-21	2,286.69
H047666	O	IN	2,295.20	2008-12-22	2009-01-21	14,038.55
O685911	O	IN	-26.51	2008-12-23	2009-01-22	21.75
H047682	O	IN	467.26	2008-12-23	2009-01-22	3,508.25
WT12/23/08	O	OA	-8,073.21	2008-12-24	2008-12-24	-8,073.21
O688346	O	IN	3.92	2008-12-29	2009-01-28	3.92
O690743	O	IN	-9.38	2008-12-30	2009-01-29	34.45
O692745	O	IN	-289.67	2009-01-02	2009-02-01	1,520.84
O692739	O	IN	-202.07	2009-01-02	2009-02-25	13,716.51
O692726	O	IN	-21.79	2009-01-02	2009-02-01	1,274.17
O692759	O	IN	962.56	2009-01-02	2009-02-25	16,945.59
O692764	O	IN	8,592.84	2009-01-02	2009-02-01	30,375.96
T333374	O	IN	6.19	2009-01-05	2009-02-04	8.24
O700195	O	IN	-94.16	2009-01-07	2009-02-25	11,678.81
O700193	O	IN	-31.86	2009-01-07	2009-02-06	16.74
O700189	O	IN	-7.32	2009-01-07	2009-02-06	1,763.22
O700198	O	IN	-1.56	2009-01-07	2009-02-06	283.84
O700191	O	IN	1,932.28	2009-01-07	2009-02-25	1,932.28
WT01/09/09	O	OA	-8,230.60	2009-01-08	2009-01-08	-8,230.60
T336635	O	IN	-24.05	2009-01-08	2009-02-07	0.30
T336659	O	IN	-2.50	2009-01-08	2009-02-07	504.90
O704031	O	IN	-1,325.11	2009-01-09	2009-02-08	816.94
H047784	O	IN	175.12	2009-01-09	2009-02-08	3,623.75
T338802	O	IN	2.85	2009-01-13	2009-02-25	3,676.27
O708483	O	IN	577.77	2009-01-13	2009-02-25	577.77
O710869	O	IN	-24.82	2009-01-15	2009-02-14	980.79
O710868	O	IN	0.01	2009-01-15	2009-02-25	5,307.94
O710871	O	IN	1.54	2009-01-15	2009-02-14	371.27
T342731	O	IN	471.28	2009-01-16	2009-02-25	1,008.32
O716663	O	IN	-243.35	2009-01-20	2009-02-19	1.08
O716717	O	IN	-99.03	2009-01-20	2009-02-19	1.08
O716686	O	IN	-62.84	2009-01-20	2009-02-19	1.08
O716842	O	IN	-62.84	2009-01-20	2009-02-19	1.08
O716824	O	IN	-32.28	2009-01-20	2009-02-19	1.08
O716688	O	IN	-17.67	2009-01-20	2009-02-19	1.08
O716745	O	IN	-12.54	2009-01-20	2009-02-19	1.08
O716714	O	IN	-1.13	2009-01-20	2009-02-19	1.08
O716742	O	IN	0.78	2009-01-20	2009-02-19	1.08
O716826	O	IN	1.08	2009-01-20	2009-02-19	1.08
O716774	O	IN	26.13	2009-01-20	2009-02-19	26.13
O716775	O	IN	26.13	2009-01-20	2009-02-19	26.13
O716814	O	IN	26.13	2009-01-20	2009-02-19	26.13
O717477	O	IN	386.41	2009-01-20	2009-02-19	400.85
O719889	O	IN	-123.36	2009-01-21	2009-02-20	8,287.84
O719895	O	IN	-0.80	2009-01-21	2009-02-20	13,092.86
O719892	O	IN	27.15	2009-01-21	2009-02-25	3,912.43
O719893	O	IN	46.54	2009-01-21	2009-02-20	165.34
O719896	O	IN	93.35	2009-01-21	2009-02-20	93.35
O719894	O	IN	2,867.10	2009-01-21	2009-02-25	8,080.53
O721801	O	IN	0.52	2009-01-22	2009-02-21	0.52
T349928	O	IN	227.68	2009-01-26	2009-02-25	943.93
O729106	O	IN	-67.01	2009-01-28	2009-02-27	12,975.77
O729110	O	IN	-28.50	2009-01-28	2009-02-25	5,761.78
O729111	O	IN	-0.14	2009-01-28	2009-02-27	8,756.48
O729107	O	IN	0.18	2009-01-28	2009-02-25	4,280.46
WT01/23/09	O	OA	-14,109.60	2009-01-29	2009-01-29	-14,109.60
O738771	O	IN	-0.49	2009-02-04	2009-03-25	8,037.49
O738741	O	IN	-0.20	2009-02-04	2009-03-06	15,200.89
WT02/02/2009	O	OA	-16,021.71	2009-02-06	2009-02-06	-16,021.71
WT01/30/09	O	OA	-38.04	2009-02-06	2009-02-06	-38.04
H048530	O	IN	-2.70	2009-02-06	2009-03-08	447.15
T360288	O	IN	13.62	2009-02-06	2009-03-08	13.62
T361518	O	IN	114.84	2009-02-09	2009-03-25	134.40
T363292	O	IN	202.50	2009-02-10	2009-03-12	1,420.41
H048707	O	IN	122.20	2009-02-12	2009-03-14	15,681.00
T365900	O	IN	23.27	2009-02-13	2009-03-15	24.35
H690518	O	IN	20.85	2009-02-16	2009-03-18	20.85
O756364	O	IN	4.17	2009-02-17	2009-03-19	4.17
O756366	O	IN	12.51	2009-02-17	2009-03-19	12.51
O756368	O	IN	142.82	2009-02-17	2009-03-19	142.82
O756349	O	IN	278.96	2009-02-17	2009-03-19	285.01
O758263	O	IN	-141.74	2009-02-18	2009-03-20	1.08
O758199	O	IN	-99.03	2009-02-18	2009-03-20	1.08
O758267	O	IN	-35.02	2009-02-18	2009-03-20	1.08
O758265	O	IN	-3.09	2009-02-18	2009-03-20	1.08
O758261	O	IN	0.56	2009-02-18	2009-03-20	1.08
O757932	O	IN	2.21	2009-02-18	2009-03-20	2.21
O757944	O	IN	18.75	2009-02-18	2009-03-20	18.75
O757921	O	IN	28.62	2009-02-18	2009-03-20	28.62
O756898	O	IN	28.68	2009-02-18	2009-03-25	13,895.94



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Bill of Lading	Status	Entry Type	Outstanding Balance	Invoice Date	Due Date	Orig Invoice Amt
O758169	O	IN	36.10	2009-02-18	2009-03-20	36.10
O756899	O	IN	46.48	2009-02-18	2009-03-20	63.48
O757983	O	IN	63.92	2009-02-18	2009-03-20	63.92
O757990	O	IN	63.92	2009-02-18	2009-03-20	63.92
O757798	O	IN	69.31	2009-02-18	2009-03-20	100.11
O757784	O	IN	101.21	2009-02-18	2009-03-20	100.11
O758142	O	IN	218.30	2009-02-18	2009-03-20	244.43
T368718	O	IN	3,088.69	2009-02-18	2009-03-20	3,088.69
H691276	O	IN	-261.08	2009-02-20	2009-03-22	23.93
T370856	O	IN	23.27	2009-02-20	2009-03-22	24.35
H048896	O	IN	56.40	2009-02-20	2009-03-22	17,409.60
O761496	O	IN	670.74	2009-02-20	2009-03-22	670.74
O761851	O	IN	1.12	2009-02-23	2009-03-25	1.12
O761872	O	IN	1.12	2009-02-23	2009-03-25	1.12
O761788	O	IN	1.67	2009-02-23	2009-03-25	2.75
O761800	O	IN	1.67	2009-02-23	2009-03-25	2.75
O761841	O	IN	1.67	2009-02-23	2009-03-25	2.75
H691458	O	IN	4.09	2009-02-23	2009-03-25	4.09
O761827	O	IN	6.59	2009-02-23	2009-03-25	7.67
O761904	O	IN	7.57	2009-02-23	2009-03-25	8.69
O761884	O	IN	35.02	2009-02-23	2009-03-25	36.10
O761701	O	IN	47.67	2009-02-23	2009-03-25	47.67
O764980	O	IN	14.44	2009-02-25	2009-03-27	14.44
O764975	O	IN	14.44	2009-02-25	2009-03-27	14.44
O764978	O	IN	14.44	2009-02-25	2009-03-27	14.44
O764926	O	IN	232.36	2009-02-25	2009-03-27	232.36
H691765	O	IN	396.52	2009-02-25	2009-03-27	400.85
WT02/19/09	O	AU	6,503.55	2009-02-25	2009-02-25	6,503.55
O767495	O	IN	0.35	2009-02-26	2009-03-25	5,169.63
O767496	O	IN	6.64	2009-02-26	2009-03-28	724.26
O767494	O	IN	242.68	2009-02-26	2009-03-28	7,492.41
O770832	O	IN	2.05	2009-03-02	2009-04-01	2.05
O770835	O	IN	2.05	2009-03-02	2009-04-01	2.05
O770822	O	IN	70.40	2009-03-02	2009-04-01	70.40
O770303	O	IN	213.90	2009-03-02	2009-04-25	213.90
WT03/02/09	O	OA	-9,914.91	2009-03-04	2009-03-04	-9,914.91
T376962	O	IN	-117.00	2009-03-04	2009-04-25	366.00
T376762	O	IN	117.00	2009-03-04	2009-04-25	117.00
O775644	O	IN	-1,256.39	2009-03-05	2009-04-25	10,244.52
O775648	O	IN	83.85	2009-03-05	2009-04-04	28,731.66
O775647	O	IN	2,372.39	2009-03-05	2009-04-25	41,504.00
H049169	O	IN	-885.60	2009-03-06	2009-04-05	17,386.02
H692977	O	IN	392.16	2009-03-06	2009-04-05	400.85
H049192	O	IN	751.10	2009-03-06	2009-04-25	4,736.34
WT03/06/09	O	OA	-221.89	2009-03-10	2009-03-10	-221.89
WT03/02/2009	O	OA	-5.22	2009-03-10	2009-03-10	-5.22
O782512	O	IN	-3,243.11	2009-03-11	2009-04-10	2.87
O782029	O	IN	-157.17	2009-03-11	2009-04-10	3,088.69
O783399	O	IN	13.76	2009-03-12	2009-04-25	9,119.09
O783397	O	IN	44.82	2009-03-12	2009-04-11	49.80
T380976	O	IN	223.16	2009-03-12	2009-04-11	223.16
H049316	O	IN	28.20	2009-03-13	2009-04-12	7,231.26
O791700	O	IN	-168.86	2009-03-19	2009-04-18	3,088.69
O791715	O	IN	-155.54	2009-03-19	2009-04-18	3,088.69
O792339	O	IN	-1.09	2009-03-19	2009-04-18	0.27
O791336	O	IN	-0.84	2009-03-19	2009-04-18	3.25
O791175	O	IN	-0.11	2009-03-19	2009-04-18	2.27
O791454	O	IN	-0.07	2009-03-19	2009-04-18	2.07
O791857	O	IN	0.67	2009-03-19	2009-04-25	7,736.44
O791859	O	IN	7.79	2009-03-19	2009-04-25	6,192.07
O791860	O	IN	49.00	2009-03-19	2009-04-18	29,476.84
O791725	O	IN	2,687.84	2009-03-19	2009-04-18	3,088.69
O791736	O	IN	3,064.34	2009-03-19	2009-04-18	3,088.69
T387418	O	IN	4.23	2009-03-23	2009-04-25	739.67
H694966	O	IN	59.38	2009-03-24	2009-04-23	59.38
O797190	O	IN	1,242.89	2009-03-24	2009-04-23	1,242.89
O797192	O	IN	1,348.21	2009-03-24	2009-04-23	1,349.29
WT03/19/09	O	OA	-1,953.32	2009-03-25	2009-03-25	-1,953.32
H049548	O	IN	27.10	2009-03-26	2009-04-25	8,250.00
T389767	O	IN	51.48	2009-03-26	2009-04-25	120.38
O799488	O	IN	241.41	2009-03-26	2009-04-25	241.41
O800638	O	IN	-400.85	2009-03-27	2009-04-26	885.90
H049559	O	IN	-10.80	2009-03-27	2009-04-26	1,788.60
H696012	O	IN	-17.00	2009-04-01	2009-05-01	285.01
T393694	O	IN	-16.13	2009-04-01	2009-05-01	540.03
T393685	O	IN	4.55	2009-04-01	2009-05-01	4.55
O807282	O	IN	-1,320.26	2009-04-02	2009-05-02	27,420.37
O807280	O	IN	-345.26	2009-04-02	2009-05-25	7,704.50
O807281	O	IN	-339.90	2009-04-02	2009-05-25	8,677.77
WT04/01/09	O	OA	-286.62	2009-04-02	2009-04-02	-286.62
T394776	O	IN	-193.35	2009-04-02	2009-05-02	3,866.93
T394316	O	IN	-12.06	2009-04-02	2009-05-25	241.31
H049639	O	IN	-10.80	2009-04-02	2009-05-02	1,788.60
H049638	O	IN	52.00	2009-04-02	2009-05-02	13,453.62
H049661	O	IN	2,854.18	2009-04-03	2009-05-25	6,497.52
T397339	O	IN	0.64	2009-04-07	2009-05-07	0.64
T397336	O	IN	0.96	2009-04-07	2009-05-07	0.96

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Bill of Lading	Status	Entry Type	Outstanding Balance	Invoice Date	Due Date	Orig Invoice Amt
O811665	O	IN	3.89	2009-04-07	2009-05-07	3.89
O811692	O	IN	9.12	2009-04-07	2009-05-07	9.12
O811686	O	IN	10.56	2009-04-07	2009-05-07	10.56
O811911	O	IN	363.31	2009-04-07	2009-05-07	363.31
O811912	O	IN	363.31	2009-04-07	2009-05-07	363.31
O812391	O	IN	3,243.11	2009-04-07	2009-05-07	3,243.11
H049751	O	IN	-10.80	2009-04-08	2009-05-08	1,788.60
O815471	O	IN	-250.80	2009-04-09	2009-05-09	8,504.40
O815092	O	IN	-246.63	2009-04-09	2009-05-25	6,459.42
O815098	O	IN	-212.08	2009-04-09	2009-05-25	4,931.93
O815103	O	IN	-15.48	2009-04-09	2009-05-09	507.24
O815095	O	IN	-12.81	2009-04-09	2009-05-09	343.57
O815877	O	IN	9.12	2009-04-09	2009-05-09	9.12
H696911	O	IN	61.14	2009-04-09	2009-05-09	360.40
H049749	O	IN	61.40	2009-04-09	2009-05-09	16,694.46
O815100	O	IN	1,347.22	2009-04-09	2009-05-09	17,165.57
WT04/02/09	O	OA	-11,863.45	2009-04-10	2009-04-10	-11,863.45
WT04/03/09	O	OA	-19.42	2009-04-10	2009-04-10	-19.42
T399407	O	IN	-4.00	2009-04-10	2009-05-25	64.00
T399732	O	IN	5.39	2009-04-10	2009-05-10	5.39
O816797	O	IN	363.31	2009-04-10	2009-05-10	363.31
T401667	O	IN	-12.45	2009-04-14	2009-05-14	1,967.23
T401466	O	IN	1.28	2009-04-14	2009-05-29	1.28
T401469	O	IN	1.28	2009-04-14	2009-05-29	1.28
O820356	O	IN	7.78	2009-04-14	2009-05-29	7.78
T401530	O	IN	87.96	2009-04-14	2009-05-14	87.96
T402317	O	IN	402.22	2009-04-15	2009-05-30	503.74
H049905	O	IN	44.80	2009-04-16	2009-05-31	12,763.20
T403210	O	IN	76.75	2009-04-16	2009-05-31	76.75
O823251	O	IN	420.89	2009-04-16	2009-05-31	420.89
O823267	O	IN	420.89	2009-04-16	2009-05-31	420.89
H049904	O	IN	751.10	2009-04-16	2009-05-16	1,652.25
O823583	O	IN	-34.11	2009-04-17	2009-05-17	1,669.68
O823585	O	IN	-2.52	2009-04-17	2009-05-17	2,226.84
O823584	O	IN	2.20	2009-04-17	2009-06-01	2.20
O823586	O	IN	226.32	2009-04-17	2009-06-01	13,987.02
T404596	O	IN	-0.40	2009-04-20	2009-05-20	561.18
O829178	O	IN	1.26	2009-04-22	2009-06-06	1.26
T406183	O	IN	796.06	2009-04-22	2009-06-06	796.06
O830644	O	IN	-97.87	2009-04-23	2009-06-07	17,165.11
O830643	O	IN	-85.34	2009-04-23	2009-05-23	13,313.98
O830642	O	IN	-10.12	2009-04-23	2009-05-23	1,978.28
O830645	O	IN	-0.20	2009-04-23	2009-06-07	1,075.05
O831013	O	IN	6.08	2009-04-23	2009-06-07	6.08
H050079	O	IN	61.40	2009-04-23	2009-06-07	20,829.46
O832785	O	IN	1.26	2009-04-24	2009-06-08	1.26
H050111	O	IN	1,201.76	2009-04-24	2009-05-24	5,566.62
H698881	O	IN	18.24	2009-04-27	2009-06-11	18.24
H050208	O	IN	17.70	2009-04-29	2009-06-13	7,803.06
H050210	O	IN	751.10	2009-04-29	2009-05-29	2,201.67
WT04/29/09	O	OA	-10,639.88	2009-04-30	2009-04-30	-11,698.25
O839729	O	IN	53.68	2009-05-01	2009-06-15	53.68
O839732	O	IN	3,243.11	2009-05-01	2009-05-31	3,243.11
O839728	O	IN	4,036.92	2009-05-01	2009-05-31	4,036.92
O839730	O	IN	15,134.33	2009-05-01	2009-05-31	15,134.33
O839731	O	IN	33,110.58	2009-05-01	2009-06-15	33,110.58
T413053	O	IN	276.34	2009-05-04	2009-06-18	276.34
T413007	O	IN	390.65	2009-05-04	2009-06-03	390.65
T414528	O	IN	106.50	2009-05-05	2009-06-04	106.50
T414541	O	IN	170.97	2009-05-05	2009-06-19	170.97
T414535	O	IN	352.27	2009-05-05	2009-06-04	352.27
T414542	O	IN	2,664.72	2009-05-05	2009-06-19	2,664.72
H050291	O	IN	4,243.14	2009-05-05	2009-06-19	4,243.14
O846827	O	IN	129.38	2009-05-07	2009-06-06	129.38
O846828	O	IN	252.66	2009-05-07	2009-06-21	252.66
O846833	O	IN	438.82	2009-05-07	2009-06-21	438.82
O846830	O	IN	3,810.75	2009-05-07	2009-06-06	3,810.75
O846826	O	IN	5,555.52	2009-05-07	2009-06-06	5,555.52
H050417	O	IN	10,504.80	2009-05-07	2009-06-21	10,504.80
O846831	O	IN	34,609.96	2009-05-07	2009-06-21	34,609.96
T416861	O	IN	0.58	2009-05-08	2009-06-22	0.58
T416860	O	IN	0.87	2009-05-08	2009-06-22	0.87
T416005	O	IN	68.24	2009-05-08	2009-06-07	68.24
T416856	O	IN	76.75	2009-05-08	2009-06-22	76.75
T415997	O	IN	164.56	2009-05-08	2009-06-22	164.56
T416789	O	IN	205.17	2009-05-08	2009-06-07	205.17
T416001	O	IN	243.72	2009-05-08	2009-06-07	243.72
T416809	O	IN	306.88	2009-05-08	2009-06-07	306.88
T416799	O	IN	4,060.28	2009-05-08	2009-06-22	4,060.28
T416852	O	IN	4,060.28	2009-05-08	2009-06-22	4,060.28
O849730	O	IN	12.77	2009-05-11	2009-06-25	12.77
H700246	O	IN	74.75	2009-05-11	2009-06-25	74.75
T417433	O	IN	76.75	2009-05-11	2009-06-25	76.75
O849738	O	IN	170.38	2009-05-11	2009-06-25	170.38
O849617	O	IN	363.31	2009-05-11	2009-06-25	363.31

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Bill of Lading	Status	Entry Type	Outstanding Balance	Invoice Date	Due Date	Orig Invoice Amt
O849618	O	IN	363.31	2009-05-11	2009-06-25	363.31
T418596	O	IN	186.43	2009-05-12	2009-06-11	186.43
O851078	O	IN	420.89	2009-05-12	2009-06-26	420.89
O851079	O	IN	420.89	2009-05-12	2009-06-26	420.89
O851080	O	IN	420.89	2009-05-12	2009-06-26	420.89
T418602	O	IN	1,604.46	2009-05-12	2009-06-26	1,604.46
O852792	O	IN	2.31	2009-05-13	2009-06-27	2.31
O852802	O	IN	2.31	2009-05-13	2009-06-27	2.31
O854043	O	IN	3.89	2009-05-13	2009-06-27	3.89
O854042	O	IN	3.89	2009-05-13	2009-06-27	3.89
O852803	O	IN	4.62	2009-05-13	2009-06-27	4.62
O853121	O	IN	8.05	2009-05-13	2009-06-27	8.05
O852800	O	IN	26.85	2009-05-13	2009-06-27	26.85
H700883	O	IN	0.28	2009-05-14	2009-06-28	0.28
O854231	O	IN	1.15	2009-05-14	2009-06-28	1.15
T420005	O	IN	5.39	2009-05-14	2009-06-28	5.39
O854227	O	IN	61.44	2009-05-14	2009-06-28	61.44
T420262	O	IN	76.72	2009-05-14	2009-06-13	76.72
O854229	O	IN	5,031.84	2009-05-14	2009-06-13	5,031.84
O854232	O	IN	6,072.66	2009-05-14	2009-06-13	6,072.66
H050578	O	IN	10,945.32	2009-05-14	2009-06-28	10,945.32
O854230	O	IN	19,465.30	2009-05-14	2009-06-28	19,465.30
T420980	O	IN	17.59	2009-05-15	2009-06-14	17.59
T420984	O	IN	291.72	2009-05-15	2009-06-29	291.72
O856036	O	IN	420.89	2009-05-15	2009-06-29	420.89
H050610	O	IN	4,166.03	2009-05-15	2009-06-14	4,166.03
T422897	O	IN	33.84	2009-05-19	2009-07-03	33.84
T422901	O	IN	1,534.79	2009-05-19	2009-07-03	1,534.79
T422173	O	IN	4,060.28	2009-05-19	2009-07-03	4,060.28
T424727	O	IN	0.29	2009-05-21	2009-07-05	0.29
T424724	O	IN	0.58	2009-05-21	2009-07-05	0.58
T424726	O	IN	0.58	2009-05-21	2009-07-05	0.58
T424728	O	IN	0.58	2009-05-21	2009-07-05	0.58
O862847	O	IN	0.80	2009-05-21	2009-07-05	0.80
T424719	O	IN	0.87	2009-05-21	2009-07-05	0.87
T424725	O	IN	0.87	2009-05-21	2009-07-05	0.87
T424722	O	IN	1.16	2009-05-21	2009-07-05	1.16
T424723	O	IN	1.16	2009-05-21	2009-07-05	1.16
O862794	O	IN	1.28	2009-05-21	2009-07-05	1.28
O862628	O	IN	2.99	2009-05-21	2009-07-05	2.99
T423965	O	IN	64.86	2009-05-21	2009-07-05	64.86
T424755	O	IN	76.75	2009-05-21	2009-07-05	76.75
T424751	O	IN	76.75	2009-05-21	2009-07-05	76.75
O863028	O	IN	230.46	2009-05-21	2009-07-05	230.46
O863149	O	IN	363.31	2009-05-21	2009-07-05	363.31
O862619	O	IN	442.60	2009-05-21	2009-07-05	442.60
O862621	O	IN	2,488.38	2009-05-21	2009-07-05	2,488.38
O862625	O	IN	3,243.11	2009-05-21	2009-06-20	3,243.11
O862617	O	IN	3,543.58	2009-05-21	2009-07-05	3,543.58
O862623	O	IN	24,358.29	2009-05-21	2009-07-05	24,358.29
H050711	O	IN	2,643.60	2009-05-22	2009-07-06	2,643.60
T425035	O	IN	4,060.28	2009-05-22	2009-07-06	4,060.28
T425458	O	IN	4,060.28	2009-05-22	2009-07-06	4,060.28
T426583	O	IN	4,060.28	2009-05-26	2009-07-10	4,060.28
T427705	O	IN	1.16	2009-05-27	2009-07-11	1.16
O868165	O	IN	6.34	2009-05-27	2009-07-11	6.34
H050817	O	IN	493.55	2009-05-27	2009-07-11	493.55
O870221	O	IN	0.82	2009-05-28	2009-07-12	0.82
O870260	O	IN	3.45	2009-05-28	2009-07-12	3.45
O870159	O	IN	66.58	2009-05-28	2009-07-12	66.58
T428337	O	IN	95.70	2009-05-28	2009-07-12	95.70
O870208	O	IN	341.35	2009-05-28	2009-07-12	341.35
O870169	O	IN	701.95	2009-05-28	2009-07-12	701.95
T428349	O	IN	747.45	2009-05-28	2009-07-12	747.45
T428356	O	IN	893.20	2009-05-28	2009-07-12	893.20
T428222	O	IN	4,060.28	2009-05-28	2009-07-12	4,060.28
O870253	O	IN	6,486.22	2009-05-28	2009-06-27	6,486.22
O870228	O	IN	7,764.60	2009-05-28	2009-07-12	7,764.60
O870240	O	IN	29,960.99	2009-05-28	2009-07-12	29,960.99
WT05/29/09	O	OA	-238.94	2009-05-29	2009-05-29	-238.94
H702681	O	IN	1.54	2009-05-29	2009-07-13	1.54
T429064	O	IN	133.35	2009-05-29	2009-07-13	133.35
T429107	O	IN	175.45	2009-05-29	2009-07-13	175.45
T429088	O	IN	438.40	2009-05-29	2009-07-13	438.40
T429153	O	IN	4,060.28	2009-05-29	2009-07-13	4,060.28
			296,495.23			

## **EXHIBIT B**

Vendor Master ID: **690564737**

Supplier Name: <b>TOYOTA MOTOR CORP</b>	Click <a href="#">here</a> to view Contract Cure Amount Details
Contract Cure Amount: <b>\$182,725.92</b>	
# of Contracts: <b>83</b>	

**Contracts**

<u>Row ID</u>	<u>GM Contract ID</u>	<u>Vendor ID</u>	<u>Counter Party Name</u>	<u>Contract Type</u>	<u>Contract Status</u>
5716-00085642	TCS26014	706072311	PANASONIC EV ENERGY CO LTD	Agreement	Objected
5716-00118715	TCS23452	706072311	PANASONIC EV ENERGY CO LTD	Agreement	Objected
5716-00526130	19KV0008	690564737	PANASONIC EV ENERGY CO LTD	Blanket Order	Objected
5716-00526131	19KV000J	690564737	PANASONIC EV ENERGY CO LTD	Blanket Order	Objected
5716-00563848	GM39094	N/A	TOYOTA MOTOR SALES, USA INC	Agreement	Objected
5716-00563849	GM59207	N/A	TOYOTA MOTOR SALES, USA INC	Agreement	Objected
5716-00564985	GM44201	N/A	TRD USA INC	Agreement	Objected
5716-00566499	GM38378	N/A	TABC INC.	Agreement	Objected
5716-00567565	GM39304	N/A	CENTRAL MANUFACTURING CO.	Agreement	Objected
5716-00569722	GM57203	N/A	PANASONIC EV ENERGY CO LTD	Agreement	Objected
5716-00570934	GM41457	N/A	CANADIAN AUTO PARTS TOYOTA INC	Agreement	Objected
5716-00576834	K13E1003	706072311	PANASONIC EV ENERGY CO LTD	Agreement	Objected
5716-00577722	N1KS0000	706072311	PANASONIC EV ENERGY CO LTD	Agreement	Objected